

From: [Kristin C. Nierengarten](#)
To: [Frank Bednarz](#); [Peter Farrell](#)
Cc: [Liz Kramer](#); [Angela Behrens](#); [Allen Barr](#); [Allie Howell](#); [Adam Schulman](#); [Austin Lysy](#); [James Dickey](#); [Zachary J. Cronen](#)
Subject: Re: Kohls et al v. Ellison, 24-cv-3754 - motion to exclude
Date: Friday, November 15, 2024 7:49:22 PM
Attachments: [image001.png](#)

Defendant Larson joins the AG's position.

Kristin



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From: Frank Bednarz <frank.bednarz@hlli.org>
Date: Friday, November 15, 2024 at 6:16 PM
To: Peter Farrell <Peter.Farrell@ag.state.mn.us>
Cc: Kristin C. Nierengarten <Kristin.Nierengarten@raswlaw.com>, Liz Kramer <Liz.Kramer@ag.state.mn.us>, Angela Behrens <Angela.Behrens@ag.state.mn.us>, Allen Barr <Allen.Barr@ag.state.mn.us>, Allie Howell <Allie.Howell@umlc.org>, Adam Schulman <adam.schulman@hlli.org>, Austin Lysy <Austin.Lysy@umlc.org>, James Dickey <James.Dickey@umwlc.org>, Zachary J. Cronen <Zachary.Cronen@raswlaw.com>
Subject: Re: Kohls et al v. Ellison, 24-cv-3754 - motion to exclude

Thanks Peter,

To be clear, do you also speak for defendant Larson on this? If not, could counsel for Larson let me know if they have a position on our intended motion.

EXHIBIT A

Frank

M. Frank Bednarz
Hamilton Lincoln Law Institute
1440 W. Taylor St # 1487
Chicago, IL 60607
801-706-2690

On Fri, Nov 15, 2024 at 1:12 PM Peter Farrell <Peter.Farrell@ag.state.mn.us> wrote:

Frank,

We oppose the motion to exclude.

Pete

Pete Farrell
Deputy Solicitor General

From: Frank Bednarz <frank.bednarz@hlli.org>
Sent: Friday, November 15, 2024 1:03 PM
To: Peter Farrell <Peter.Farrell@ag.state.mn.us>
Cc: Kristin C. Nierengarten <Kristin.Nierengarten@raswlaw.com>; Liz Kramer <Liz.Kramer@ag.state.mn.us>; Angela Behrens <Angela.Behrens@ag.state.mn.us>; Allen Barr <Allen.Barr@ag.state.mn.us>; Allie Howell <Allie.Howell@umlc.org>; Adam Schulman <adam.schulman@hlli.org>; Austin Lysy <Austin.Lysy@umlc.org>; James Dickey <James.Dickey@umwlc.org>; Zachary J. Cronen <Zachary.Cronen@raswlaw.com>
Subject: Re: Kohls et al v. Ellison, 24-cv-3754 - motion to exclude

Hello Counsel,

Plaintiffs intend to file a *Daubert* motion to exclude the declarations of Jeff Hancock and Javin West for consideration in resolving Plaintiffs' motion for preliminary injunction based on FRE 702.

Please let me know whether either of the defendants take no position on the motion to exclude, or would agree to a stipulation that might narrow the issues of our motion under LR 7.1.

I'm generally free today to discuss by phone.

EXHIBIT A

Best regards,

Frank

M. Frank Bednarz
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